

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ROBERT DAVIS,
and
D. ETTA WILCOXON,
Plaintiffs,

**Case No. 17-cv-11742
HON.MARK A. GOLDSMITH**

v

**DETROIT DOWNTOWN DEVELOPMENT AUTHORITY, DETROIT
BROWNFIELD REDEVELOPMENT AUTHORITY, DETROIT CITY
COUNCIL and CHRISTA MCCLELLAN, TREASURER**
Defendants.

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DECLARATION OF ANDREW A. PATERSON

Andrew A. Paterson, makes the following Declaration under the penalty of perjury pursuant to 28 USC§1746:

1. The facts set forth in the Motion for Reconsideration are true and accurate.
2. I was unable to make the sanction award payment of in the amount ordered by the Court as I did not possess liquid assets that could fund such, nor did I hold any accounts receivable from clients that would facilitate payments of such amount.
3. I have paid other sanction awards in other matters that I was able to pay or schedule payments upon.
4. I have never, previous to the receipt for the amount for full payment of the award, had a client that **advanced** me a fee.
5. In recent years my litigation practice has been either contingent or (mostly) *pro bono*. The fees that I do receive are mostly awarded after successful Open Meeting cases and Freedom of Information cases and they have been mostly modest. I have not received any material fee for the numerous election law cases that I have brought to enforce the election law against those that violate it.
6. My spouse has maintained my household and personal expenses and management throughout our 55 year marriage. I transfer monies net of expenses to her as I earn them and have done so for 55 years,
7. I did not transfer any monies to my spouse to avoid payment of this award or any other sanction award.
8. I offered candid testimony about my financial condition during my creditors exam, Defendant's counsel had a complete picture of my finances but were selective and misleading in identifying my financial condition in their motion for contempt.

I declare under penalty of perjury that the foregoing is true and correct,

10 Oct 2021

S/ Andrew A. Paterson

Andrew A. Paterson